



**ROY ROMER**  
Governor

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September 23, 1992

Mr. Martin Hestmark  
U.S. Environmental Protection Agency  
Region VIII  
999 18th Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405



000016536

**RE: Draft Phase I RFI/RI Workplan for OU 14, Radioactive Sites; June, 1992**

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document prepared by DOE and prime operating contractor, EG&G.

Enclosed please find the Division's comments.

If you have any questions regarding these matters, please call John Reschf of my staff at 331-4803 through September 30, or at 692-3354 beginning October 5.

Sincerely,

Gary W. Baughman, Chief  
Facilities Section  
Hazardous Waste Control Program

Enclosure

cc: Frazer Lockhart, DOE  
Mike Arndt, EG&G  
Charles Hayes, EG&G  
Jackie Berardini, CDH-OE

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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Ref: SHWM-FF

Mr. Frazer Lockhart  
Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

SEP 29 1992

Re: Review of OU 14  
Draft RFI/RI Work Plan

Dear Mr. Lockhart:

Enclosed are the Environmental Protection Agency and Colorado Department of Health technical reviews of the Draft RFI/RI Work Plan for Operable Unit 14, Rocky Flats Plant. There are many comments that need to be addressed, especially with regard to the field sampling plan.

The most general shortcoming of this plan, in addition to technical inadequacies, is that it fails to consider the protected area IM/IRA now in development or other ongoing activities which make implementation as written very unlikely. In combination with DOE's apparent inability to implement obligations defined within the IAG as documented in other correspondence, this failure reduces the work plan to a paperwork exercise which achieves only superficial compliance with established milestones. Until and unless this work plan can be integrated into DOE's overall approach to the Transition, Decontamination and Decommissioning (D&D), and Environmental Restoration (ER) of Rocky Flats, approval of the Final Workplan may not advance the ER program at Rocky Flats.

If you or members of your staff have any questions regarding EPA's comments, please contact Bill Fraser at 294-1081.

Sincerely,

Martin Hestmark, Manager  
Rocky Flats Project

Enclosures

cc: w/enc.  
John Reschl, CDH  
Larry Reck, PRC